

The Honorable Kimberly K. Evanson

**UNITED STATES DISTRICT COURT
WESTERN DISTRICT OF WASHINGTON, AT SEATTLE**

UNITED STATES OF AMERICA, *ex*
rel. by KHUSHWINDER SINGH

Plaintiff,

vs.

ALEDADE, INC.; a Delaware
Corporation and related corporations and
LLC's,

Defendants.

NO. 21-cv-0410-KKE

JOINT STATEMENT
PURSUANT TO LCR 37(a)(2)

Filed Under Seal
pursuant to
31 U.S.C. §3730(b)(2)

I. INTRODUCTION

The parties have asked for the Court's assistance in resolving a discovery scheduling dispute relating to the discovery cutoff. The parties met and conferred on the topic on June 26, 2025 at a deposition but remained in conflict. The Court agreed to hear the matter "telephonically" in a video conference today and asked for this Joint Statement pursuant to Local Civil Rule 37(a)(2).

II. JOINT STATEMENT OF THE ISSUE

Plaintiff's Position: After the Court's order of June 18, 2025, Plaintiff immediately properly noted three depositions (with reasonable notice) for dates within the Court's Order. Defendant asserts its counsel represents all three witnesses. Defendant made two of the witnesses available, one on June 26, 2025 and one on June 30, 2025, but have been unable or unwilling to schedule

1 the third witness prior to the adjusted deadline of June 30, 2025. Defendant declines to agree to
2 later dates for this witness.

3 Plaintiff seeks an Order allowing and compelling the deposition to be taken at a mutually
4 reasonably convenient time within the next two weeks. Defendant opposes any further discovery
5 extension.

6 Defendant's position rehashes arguments made at the June 18, 2025 hearing. Its failure
7 to cooperate in Plaintiff's efforts to comply with the Court's Order is reflected below: It chose to
8 schedule Mr. Haque and Ms. Maxson at a time that Ms. Chasson was apparently available,
9 strategically avoiding compliance. Now Defendant asks to avoid compliance with the Court's
10 Order and timely noted depositions by a bald claim that Ms. Chasson's convenience would be
11 impacted because she had other plans. This matter is a whistleblower wrongful termination claim.
12 Dr. Singh opposed actions that would be Medicare fraud if he had not stopped the Defendants'
13 behavior. Ms. Chasson was the compliance leader. Her deposition is one of the most important,
14 and should be allowed.

15 *Defendant's Position:* Pursuant to the Order Setting Trial and Related Dates dated October 15,
16 2024 (ECF 53), the discovery deadline in this Action was May 30, 2025. On May 23, 2025,
17 Plaintiff moved to extend the discovery deadline to seek to take the three depositions. ECF 61.
18 Plaintiff did not offer any reason for his lack of diligence or any reason to explain the cause for
19 his delay. ECF 61. By Order dated June 18, 2025, the Court extended the discovery deadline to
20 June 30, 2025 (the "Discovery Extension Order"). ECF 68. Following the June 18, 2025
21 conference, Plaintiff noticed the depositions of Ahmed Haque, Sarah Chasson, and Emily Maxson
22 for the morning of June 26, afternoon of June 26, and June 27, 2025, respectively.¹

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24 ¹ It should be noted that June 17, 2025, the day *before* the conference on Plaintiff's motion for an extension of
25 time, counsel for Defendant emailed counsel for Plaintiff and requested a call in advance of the conference.

The purpose of the call was to discuss proposed scheduling and other logistics in advance of the June 18,

The deposition of Mr. Haque was conducted on June 26, 2025 and the deposition of Ms. Maxson is scheduled for June 30, 2025. Non-party and former Aledade employee Sarah Chasson—is unavailable before the June 30, 2025 deadline due to prior professional commitments, previously scheduled air travel, and the timing of the other depositions.

Defendant fully complied with the Discovery Extension Order and used best efforts to coordinate the deposition on or before the June 30, 2025 deadline. Counsel for Defendant immediately reached out to each of the witnesses following the June 18, 2025 conference. Counsel for Defendant and each of the witnesses made substantial efforts—rearranging schedules, clearing conflicts, and cancelling personal and professional commitments—to facilitate depositions.

Despite Defendant's substantial efforts, Plaintiff now seeks yet another unwarranted extension to depose Ms. Chasson. Plaintiff should not be rewarded with additional time after flouting the original May 30, 2025 deadline and now requesting a second unjustified extension.

III. CONCLUSION

The parties anticipate supplying further information to the Court as the Court may request in the upcoming hearing, and appreciate the Court's time in making a ruling

DATED this 27th day of June, 2025.



Stephen A. Teller, WSBA #23372
Attorney for Dr. Singh

On behalf of all Plaintiff's counsel

2025 conference. Counsel did not respond. Had Plaintiff's counsel sought to proactively discuss scheduling in advance of the June 18, 2025 conference, the parties may have been able to meaningfully engage and avoid wasting the Court's time now.

1 /s/ Jeffrey Coopersmith per email approval by
2 LisaMarie Collins 6/27/25 at 11:30 Pacific time

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